



Entergy Services, LLC  
639 Loyola Avenue (70113)  
P.O. Box 61000  
New Orleans, LA 70161-1000  
Tel 504 576 6571  
Fax 504 576 5579

Timothy S. Cragin  
Assistant General Counsel  
Legal Services - Regulatory

March 8, 2019

**By Hand Delivery**

Ms. Lora W. Johnson, CMC, LMMC  
Clerk of Council  
City Hall - Room 1E09  
1300 Perdido Street  
New Orleans, LA 70112

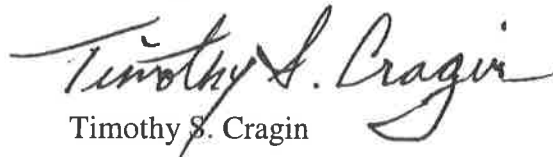
**Re: Resolution Directing Entergy New Orleans, Inc. to Investigate and Remediate  
Electric Service Disruptions and Complaints and to Establish Minimum  
Electric Reliability Performance Standards and Financial Penalty Mechanisms  
– CNO Docket No. UD-17-04**

Dear Ms. Johnson:

Please find enclosed for your further handling an original and three copies of Entergy New Orleans, LLC's ("ENO") Response to Comments of the Sewerage and Water Board of New Orleans and the Council Advisors regarding ENO's 2019 Reliability Plan, which is submitted pursuant to Judge Jeffrey S. Gulin's Order dated November 19, 2018, and is being filed in the above-referenced docket. Please file an original and two copies into the record and return a date-stamped copy to our courier.

Thank you for your assistance with this matter.

Sincerely,

  
Timothy S. Cragin

TSC\rdm

Enclosures

cc: Official Service List (UD-17-04 via electronic mail)

Mar 10 2019

**BEFORE THE  
COUNCIL OF THE CITY OF NEW ORLEANS**

**RESOLUTION DIRECTING )  
ENTERGY NEW ORLEANS, INC. TO )  
INVESTIGATE AND REMEDIATE )  
ELECTRIC SERVICE DISRUPTIONS )  
AND COMPLAINTS AND TO )  
ESTABLISH MINIMUM ELECTRIC )  
RELIABILITY PERFORMANCE )  
STANDARDS AND FINANCIAL )  
PENALTY MECHANISMS )**

**DOCKET NO. UD-17-04**

**ENTERGY NEW ORLEANS, LLC'S RESPONSE TO COMMENTS OF THE  
SEWERAGE AND WATER BOARD OF NEW ORLEANS  
AND THE COUNCIL ADVISORS  
REGARDING ENO'S 2019 RELIABILITY PLAN**

Entergy New Orleans, LLC ("ENO" or the "Company") respectfully submits this Response to the Comments filed by Intervenor, the Sewerage and Water Board of New Orleans ("SWBNO"), and by the Advisors to the Council of the City of New Orleans (the "Council") related to the ENO's 2019 Reliability Plan that was filed with the Council on January 18, 2019.

**I. Response to Comments of the SWBNO**

The Comments of the SWBNO regarding ENO's 2019 Reliability Plan can essentially be boiled down to two issues: (1) Why doesn't ENO's 2019 Reliability Plan specifically address the reliability of electric service to the SWBNO?; and (2) How does ENO know that its overall reliability budget and the allocation of dollars to specific reliability programs is sufficient?

In response to the first issue, ENO's 2019 Reliability Plan is not intended to set forth specific reliability actions as to SWBNO or any other specific customer, but rather addresses reliability to the New Orleans community as a whole. The purpose of the plan is to provide the Council with details regarding the reliability work that ENO plans to carry out in 2019, the

dollars it intends to spend in performing that work, and the specific reliability programs that will be implemented. Nevertheless, ENO has performed significant reliability work in the recent past on feeders and substations serving SWBNO, including performing infrared inspections of Joliet feeder 2022 and 2016 and Southport feeder B0527 and correcting all maintenance items (e.g., loose connections, damaged cross-arms, insulators, and arrestors, etc.) found during the inspections; performing monthly infrared inspections at the Southport substation; installing new primary and backup relaying on the Southport-Ninemile, Southport-Labarre, and Midtown-Southport transmission lines; installing new primary and backup relaying and upgraded load tap changer on Southport Transformer #1; and installing animal mitigation to address Monk parakeets at the Joliet and Southport substations.

Additionally, SWBNO is well aware that a dedicated ENO team has been working very closely with, and meeting regularly with, SWBNO representatives to address SWBNO reliability issues and to develop specific plans for short-term, medium-term and long-term improvements that will allow SWBNO to better and more reliably serve the citizens of New Orleans. Portions of those short-term actions are contemplated as part of ENO's 2019 Reliability Plan. For example, critical feeders that serve SWBNO will be inspected by ENO's Fix-It-Now ("FIN") crew twice a year, in March and September, and any work needed as a result of those inspections will be scheduled and prioritized in conjunction with other work resulting from other FIN inspections. Additional action items include establishing a direct line of communication between SWBNO and Entergy Control Centers, completing site visits of SWBNO and Entergy Control Centers to better understand operations, and implementing new communication protocol between SWBNO and Entergy Control Room operators.

ENO believes that its dedicated SWBNO team and the regular meetings that are taking place provide a reasonable process to allow ENO and the SWBNO to cooperate on solutions and will hopefully provide for the two-way exchange of information that is critical to moving SWBNO reliability forward.

With regard to the second issue, the budgeting of reliability dollars and the allocation of those budgeted dollars to individual reliability programs is not an exact science. The amount of dollars budgeted involves an attempt to reasonably balance numerous considerations including, without limitation, recent reliability experience, effectiveness of past programs under past budgets, overall cost to customers, Council and community expectations, and the availability of the labor and contract resources needed to perform the work. Distribution-line-related customer interruptions in 2018 decreased by approximately 20% as compared to 2017, a significant one-year improvement. Additionally, as of March 3, 2019, ENO distribution-line related customer interruptions are down approximately 70% compared to the same period in 2018, suggesting that the significant investment that ENO has made in reliability over the last few years is having a very positive effect on reliability. ENO believes that the overall budget for its 2019 Reliability Plan and the allocation of that budget to individual reliability programs is reasonable and will provide for continued improvement in electric reliability in 2019 as compared to 2018 and prior years. Nevertheless, ENO can check and adjust the overall budget and/or the allocation of dollars to individual programs during the year, if circumstances warrant.

## **II. Response to Comments of the Council Advisors**

The Advisors in their Comments state that ENO's 2019 Reliability Plan should positively support ongoing reliability improvements and recommend that the Council accept ENO's 2019

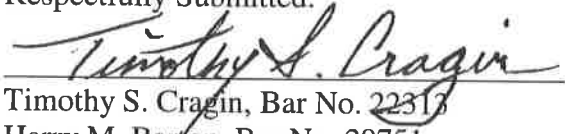
Plan. ENO agrees with the Advisors in this regard and believes that its 2019 Reliability Plan represents another step forward towards improved electric system reliability for its customers.

### **III. Conclusion**

Overall, ENO is pleased with the progress made in 2018 and year-to-date in 2019 with regard to reliability and looks forward to continuing to refine its reliability work to make continued progress in its reliability efforts going forward. Considering the foregoing, ENO requests that the Council accept ENO's 2019 Reliability Plan.

Respectfully Submitted:

By:



Timothy S. Cragin, Bar No. 22313

Harry M. Barton, Bar No. 29751

639 Loyola Avenue, Mail Unit L-ENT-26E

New Orleans, Louisiana 70113

Telephone: (504) 576-6571

Facsimile: (504) 576-5579

**ATTORNEYS FOR ENTERGY NEW  
ORLEANS, LLC**

## **CERTIFICATE OF SERVICE**

**Docket No. UD-17-04**

I hereby certify that I have served the required number of copies of the foregoing report upon all other known parties of this proceeding, by the following: electronic mail, facsimile, overnight mail, hand delivery, and/or United States Postal Service, postage prepaid.

Ms. Lora W. Johnson, CMC, LMMC  
Clerk of Council  
Council of the City of New Orleans  
City Hall, Room 1E09  
1300 Perdido Street  
New Orleans, LA 70112

Erin Spears, Chief of Staff  
Connolly A. F. Reed  
Council Utilities Regulatory Office  
City of New Orleans  
City Hall, Room 6E07  
1300 Perdido Street  
New Orleans, LA 70112

David Gavlinski  
Council Chief of Staff  
New Orleans City Council  
City Hall, Room 1E06  
1300 Perdido Street  
New Orleans, LA 70112

Sunni LeBeouf  
Bobbie Mason  
City Attorney Office  
City Hall, Room 5th Floor  
1300 Perdido Street  
New Orleans, LA 70112

Norman White  
Department of Finance  
City Hall, Room 3E06  
1300 Perdido Street  
New Orleans, LA 70112

Hon. Jeffery S. Gulin  
3203 Bridle Ridge Lane  
Lutherville, MD 21093

Andrew Tuozzolo  
CM Moreno Chief of Staff  
1300 Perdido Street, Room 2W40  
New Orleans, LA 70112

Clinton A. Vince  
Presley R. Reed, Jr.  
Emma F. Hand  
Herminia Gomez  
Dentons US LLP  
1900 K Street, NW  
Washington, DC 20006

Basile J. Uddo  
J.A. "Jay" Beatmann, Jr.  
c/o Dentons US LLP  
The Poydras Center  
650 Poydras Street, Suite 2850  
New Orleans, LA 70130-6132

Yves Gelin  
Wilkerson and Associates, PLC  
The Poydras Center, Suite 1913  
650 Poydras Street  
New Orleans, LA 70130

Joseph W. Rogers  
Philip J. Movish  
Lauren Oliva  
Legend Consulting Group  
8055 East Tufts Avenue  
Suite 1250  
Denver, CO 80237-2835

Errol Smith  
Bruno and Tervalon  
4298 Elysian Fields Avenue  
New Orleans, LA 70122

Brian Guillot  
Vice President, Regulatory Affairs  
Entergy New Orleans, LLC  
1600 Perdido Street  
Mail Unit L-MAG-505B  
New Orleans, LA 70112

Polly S. Rosemond  
Derek Mills  
Seth Cureington  
Entergy New Orleans, LLC  
1600 Perdido Street  
Mail Unit L-MAG-505B  
New Orleans, LA 70112

Timothy S. Cragin  
Alyssa Maurice-Anderson  
Harry M. Barton  
Karen Freese  
Entergy Services, LLC  
639 Loyola Avenue  
Mail Unit L-ENT-26E  
New Orleans, LA 70113

Joseph J. Romano, III  
Suzanne Fontan  
Therese Perrault  
Entergy Services, LLC  
639 Loyola Avenue  
Mail Unit L-ENT-4C  
New Orleans, LA 70113

Emily K. Leitzinger  
Mid-City Neighborhood Organization  
4313 Palmyra Street  
New Orleans, LA 70119

Logan Atkinson Burke  
Forest Bradley-Wright  
Sophie Zaken  
Alliance for Affordable Energy  
4505 S. Claiborne Avenue  
New Orleans, LA 70125

Julianna D. Padgett  
Carrollton Riverbend Neighborhood Assn.  
935 Dante Street  
New Orleans, LA 70118

Ian Dreyer  
Parkview Neighborhood Association  
872 Taft Place  
New Orleans, LA 70119

Jacob Rickoll  
Tulane Canal Neighborhood Association  
2301 Conti Street  
New Orleans, LA 70119

Abigail Sebtan  
Urban Conservancy Petition  
1307 OC Haley Boulevard #307  
New Orleans, LA 70113

Keith Hardie  
Maple Area Residents, Inc.  
618 Audubon Street  
New Orleans, LA 70118

Monique Harden  
Deep South Center for  
Environmental Justice, Inc.  
3157 Gentilly Boulevard, #145  
New Orleans, LA 70122

Renate Heurich  
350 Louisiana-New Orleans  
1407 Napoleon Avenue, #B  
New Orleans, LA 70115

Luke F. Piontek  
Judith Sulzer  
Roedel, Parsons, Koch, Blache, Balhoff  
& McCollister  
8440 Jefferson Highway  
Suite 301  
Baton Rouge, LA 70809

James E. Thompson, III  
Sewerage and Water Board  
625 St. Joseph Street, Room 201  
New Orleans, LA 70165

Eric J. Songy  
Algiers Neighborhood Presidents Council  
P.O. Box 740446  
New Orleans, LA 70174

Warrenetta C. Banks  
Lower 9 Resilient  
5130 Chartres Street  
New Orleans, LA 70117-3808

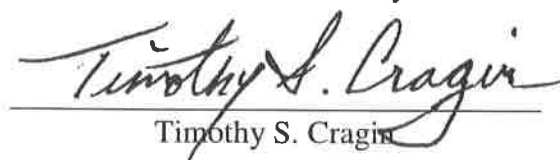
Arthur J. Johnson  
Lower 9<sup>th</sup> Ward Center for Sustainable  
Engagement and Development  
5227 Chartres Street  
New Orleans, LA 70117

David Dalia  
609 Dumaine Street  
New Orleans, LA 70115-3210

Dawn Hebert  
6846 Lake Willow Dr.  
New Orleans, LA. 70126

Denise T. Turbinton  
931 Mazant St.  
New Orleans, LA 70117

New Orleans, Louisiana, this 8<sup>th</sup> day of March 2019.

  
Timothy S. Cragin